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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

HCL PARTNERS LIMITED PARTNERSHIP, On Behalf of Itself and All Others Similarly Situated, Plaintiff, v. LEAP WIRELESS INTERNATIONAL, INC., S. DOUGLAS HUTCHESON, MARK H. RACHESKY, AMIN I. KHALIFA, and PRICEWATERHOUSECOOPERS Defendants.	CLASS ACTION NO. 07 CV 2245 BTM (NLS) **JOINT MOTION REGARDING EXTENSION OF TIME FOR RESPONSE TO COMPLAINT AND ADDITIONAL FILING PERIODS** The Honorable Barry T. Moskowitz, United States District Court Judge

CASE CAPTIONS CONTINUED ON NEXT PAGE

FRANK CHAREK, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. LEAP WIRELESS INTERNATIONAL, INC., S. DOUGLAS HUTCHESON, MARK H. RACHESKY, AMIN I. KHALFIA, GLENN UMETSU and DEAN M. LUVISA, Defendants.	CLASS ACTION NO. 07 CV 2256 BTM (NLS)
DEVAY CAMPBELL, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. LEAP WIRELESS INTERNATIONAL, INC. S. DOUGLAS HUTCHESON, MARK H. RACHESKY, AMIN I. KHALFA, GLENN UMETSU and DEAN M. LUVISA, Defendants.	CLASS ACTION NO. 07 CV 2297 BTM (NLS)

WHEREAS, the parties have conferred regarding the time in which Defendants must respond to the above-captioned actions;

WHEREAS, after the first-captioned action was filed, *HCL Partners LLC v. Leap Wireless International Inc.*, Case No. 07CC2245 (November 27, 2007) ("*HCL Partners*"), the next-captioned actions were filed in the United States District Court for the Southern District of California concerning the same federal subject matter and substantially similar claims, *Frank Charek v. Leap Wireless International, Inc.*, Case No. 07 CV 2256 (November 29, 2007) ("*Charek*"); and *Devay Campbell v. Leap Wireless International, Inc*, Case No. 07 CV 2297 (December 7, 2007) ("*Campbell*");

WHEREAS, the *Charek* action (initially assigned to Judge Sabraw) and the *Campbell* action (initially assigned to Judge Huff) were transferred to Judge Moskowitz pursuant the "Low Number" Rule on December 13, 2007 and December 14, 2007;

WHEREAS, these actions are governed by the Private Securities Litigation Reform Act ("PSLRA") and are subject to motions for consolidation and for the appointment of a lead plaintiff and approval of lead plaintiff's selection of counsel prior to the filing of a Consolidated Complaint (15 U.S.C. § 78u-4(a)(3));

THEREFORE, the undersigned counsel jointly move for an order stating that:

1. The Defendants need not respond to the complaints filed in the above-captioned matters until after the matters are consolidated, a Lead Plaintiff is appointed, Lead Plaintiff's counsel is approved, and Lead Plaintiff files a Consolidated Complaint.

2. Absent further stipulation of the parties and order of the Court:

a. The Lead Plaintiff shall have 45 days after appointment to file and serve a Consolidated Complaint;

b. Defendants shall have 45 days in which to file and serve a motion to dismiss or otherwise respond to the Consolidated Complaint;

c. The Lead Plaintiff shall have 45 days after defendants' motion to dismiss to file and serve an opposition; and

d. Defendants shall have 30 days after Lead Plaintiff's opposition to file and serve a reply.

Dated: December 28, 2007

By /s/ Kimberly Arouh Hicks

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